

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #024
2.	Title	Mr
	First Name	Derek
	Last Name	Ritson
	Profession	Retired – Former Communications Engineer I. Eng. M.I.E.T.
3.	Representative	Planning Adviser Executive Committee Member
4.	Organisation	Monks Orchard Residents' Association
5.	Address Line 1	██████████
	Address Line 2	████████████████████
	Address Line 3	██████████
	Postcode	██████████
6.	Email Address	planning@mo-ra.co

Intentionally blank

Name or organisation: **Monks Orchard Residents' Association**

7. To which part of the Croydon Local Plan Review does this representation relate?

Croydon Local Plan Review:

Policy Option Figure/Table

8. Do you think that the proposed policy or part of the plan meets the objectively assessed development and infrastructure requirements for Croydon (and the unmet needs of neighbouring authorities) as defined in **NPPF (2019) para 16**?

Yes No

9. If No
Which sub paragraph of para 16 does the policy **NOT meet NPPF Patra 16**.

Par a)	<input checked="" type="checkbox"/>	Par b)	<input checked="" type="checkbox"/>
Par c)	<input checked="" type="checkbox"/>	Par d)	<input checked="" type="checkbox"/>
Par e)	<input checked="" type="checkbox"/>	Par f)	<input checked="" type="checkbox"/>

The following comments and clarifications relate to the current Croydon Local Plan (2018) which requires clarification in order to meet NPPF (2018/19) Para 16 - Plan Making:

Plan Making

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development¹⁰;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

CLP2	CLP2 Policy Text	CLP2 Issues or clarification for CLP3
Policy SP5	Community Facilities	
Policy DM19	Providing & protecting community facilities	
DM19.1	<p>The Council will permit the loss of existing community facilities where:</p> <ol style="list-style-type: none"> It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community; The existing use is located on the ground floor within a Main Retail Frontage, a Secondary Retail Frontage, a Shopping Parade or a Restaurant Quarter Parade; or Community facilities for a specific end user (either on site or off site as part of a comprehensive redevelopment) that meet current or future needs are provided. 	<p>We have very few community facilities – we need more not less Define available sites.</p> <p>Or sites appropriate for development to provide new premises accessible to all Shirley residents – not just council estates.</p> <p>Assessment of current provision and any need for any redistribution between Wards.</p>
DM19.2	<p>The Council will support applications for community use where the proposals:</p> <ol style="list-style-type: none"> Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion; Comply with the criteria for D1 class uses in industrial locations set out in Table 5.1; Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a District or Local Centre, have no more than 280m² of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade. 	<p>Check D1 Class usage – what is it? Reference Table of permitted usage types? Where?</p> <p>Table 5.1 does not list permitted usage types but lists their designations.</p>
Policy DM21	Protecting Public Houses	

	<p>The Council will not grant planning permission for the demolition or change of use of a public house which displays the characteristics of a community pub such as:</p> <ul style="list-style-type: none"> • space for organised: social events such as pub quizzes, darts competitions, pool leagues; • Meeting rooms, performance spaces, room for hire (appropriately sound proofed); • Ancillary facilities (skittles alley, children’s play area); and • Associated clubs and teams. <p>Unless:</p> <p>a. The loss of the public house would not result in a shortfall of local public house provision of this type;</p> <p>b. That the public house is no longer considered economically viable when considered against the CAMRA’s Public House Viability Test; and that a range of measures have been undertaken to seek to improve viability including (but not restricted to):</p> <ul style="list-style-type: none"> • Hosting quiz nights, craft fairs, live music or comedy; • Food offer diversification; • Providing B&B Accommodation; • Renting out space for meetings, classes or community events; • Maintenance, repair and visual improvements; • Varied opening hours; and <p>c. The public house has been marketed as a public house, at a market rate for public houses, for a consistent period of 18 months.</p>	<p>Viability of retention?</p> <p>Define “appropriately sound proofed” – to what level of requirement In dBA limits and over what distance?</p> <p>a) Define shortfall of this type – i.e. quantity per given area – otherwise has no meaning.</p> <p>b) Clarify the actual limits? What would be considered “viable” or “unviable” – otherwise could NOT sustain a challenge.</p> <p>c) Clarify this phrase for it to be a meaningful requirement?</p>
<p>Policy DM22</p>	<p>Cemeteries & Burial grounds</p>	<p>No Comment – All to be retained</p>